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*Attorneys for Defendants*  
*C. R. Bard, Inc. and*  
*Bard Peripheral Vascular, Inc.*

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF ARIZONA**

IN RE: Bard IVC Filters Products Liability  
 Litigation,

No. 2:15-MD-02641-DGC

**DEFENDANTS' PROPOSED  
 VERDICT FORM**

This Document Relates to:

Debra Tinlin, et al. v. C. R. Bard, Inc., et al.  
 CV-16-00263-PHX-DGC

(Assigned to the Honorable David  
 G. Campbell)

We, the jury, duly empaneled and sworn in the above entitled action, upon our  
 oaths, find a follows:

**A. LIABILITY**

1. Do you find by the greater weight of the evidence, to a reasonable certainty, that Bard is liable to Mrs. Tinlin on the strict product liability design defect claim?

\_\_\_\_ Yes \_\_\_\_ No

2. Do you find by the greater weight of the evidence, to a reasonable certainty, that Bard is liable to Mrs. Tinlin on the negligent design claim?

\_\_\_\_ Yes \_\_\_\_ No

3. Do you find by the greater weight of the evidence, to a reasonable certainty, that Bard is liable to Mrs. Tinlin on the strict product liability warning defect claim?

\_\_\_\_ Yes \_\_\_\_ No

4. Do you find by the greater weight of the evidence, to a reasonable certainty, that Bard is liable to Mrs. Tinlin on the negligent warning claim?

\_\_\_\_ Yes \_\_\_\_ No

5. Do you find by the greater weight of the evidence, to a reasonable certainty, that Brad is liable to Mrs. Tinlin on the fraudulent concealment claim?

\_\_\_\_ Yes \_\_\_\_ No

If you answered “No” to each question in Part A, do not complete Parts B, C or D. If you answered “Yes” to any question in Part A, please complete B, C and D.

**B. COMPENSATORY DAMAGES**

1. If you found Bard liable to Mrs. Tinlin on any of the claims set forth above, what amount of damages do you fill will reasonably compensate Mrs. Tinlin for her injuries?

\$\_\_\_\_\_

2. Do you find by the greater weight of the evidence, to a reasonable certainly, that Mr. Tinlin sustained a loss of consortium?

\_\_\_\_ Yes \_\_\_\_ No

3. If you answered “Yes” to Question B.2., then answer this question. Otherwise do not answer it. What amount of damages do you find will reasonably compensate Mr. Tinlin for his loss of consortium?

\$\_\_\_\_\_

### C. APPORTIONMENT OF NEGLIGENCE

1. Do you find by the greater weight of the evidence, to a reasonable certainty, that Dr. Joshua Riebe was negligent and that his negligence was a cause of Mrs. Tinlin’s injuries?

\_\_\_\_ Yes \_\_\_\_ No

2. Do you find by the greater weight of the evidence, to a reasonable certainty, that Dr. Robert Haller was negligent and that his negligence was a cause of Mrs. Tinlin’s injuries?

\_\_\_\_ Yes \_\_\_\_ No

If you answered “yes” to Question Nos. C.1 and/or C.2, then answer this question:  
What percentage of total responsibility do you attribute to the following:

Bard: \_\_\_\_\_

Dr. Riebe: \_\_\_\_\_

Dr. Haller: \_\_\_\_\_

Total: 100%

**D. PUNITIVE DAMAGES**

Do you find by clear, satisfactory, and convincing evidence, to a reasonable degree of certainty, that punitive damages should be awarded against Bard?

\_\_\_\_ Yes \_\_\_\_ No

Presiding Juror Number

Date

RESPECTFULLY SUBMITTED this 12th day of April, 2019.

s/ Richard B. North, Jr.

Richard B. North, Jr.

Georgia Bar No. 545599

Matthew B. Lerner

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